

EXHIBIT C

DAYSTAR PETERSON
APRIL 09, 2025

JOB NO. 1481293

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF FLORIDA
3

4
5 Case No. 1:24-cv-2422
8-CMA

6 Megan Pete,

7 Plaintiff, VOLUME I

8 v.

9
10 Milagro Elizabeth Cooper,

11 Defendant.
12

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14 VIDEOTAPED DEPOSITION OF
15 DAYSTAR PETERSON
16 LOS ANGELES, CALIFORNIA
17 WEDNESDAY, APRIL 9, 2025
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APRIL 09, 2025

JOB NO. 1481293

1 The deposition of DAYSTAR PETERSON was taken
2 on behalf of the Plaintiff via videoconference in
3 Tehachapi, California, commencing at 10:06 AM on
4 Wednesday, April 9th, 2025, before Ronny Zavosky,
5 CSR No. 12359.

6

7 A P P E A R A N C E S

8

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10

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APRIL 09, 2025

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1 A P P E A R A N C E S (Continued):

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1 A P P E A R A N C E S (Continued):

2

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11

12 ALSO PRESENT:

13

14 GABBY TREVINO, QUINN EMANUEL URQUHART & SULLIVAN, LLP

15 AIDAN GINN, VIDEOGRAPHER

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I N D E X

WITNESS: DAYSTAR PETERSON

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I N F O R M A T I O N R E Q U E S T E D

P A G E L I N E

(None)

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1 WEDNESDAY, APRIL 9th, 2025; TEHACHAPI, CALIFORNIA

2 10:06 AM

3 - - -

10:06:36 4 THE VIDEOGRAPHER: Good morning. We are on
10:06:37 5 the record at 10:06 AM Pacific time on
10:06:42 6 April 9th, 2025, to begin the deposition of
10:06:46 7 Daystar Peterson in the matter of Megan Pete versus
10:06:51 8 Milagro Elizabeth Cooper.

10:06:53 9 The venue for this case is the United States
10:06:55 10 District Court, Southern District of Florida. The case
10:06:59 11 number is 1:24-cv-24228-CMA.

10:07:11 12 This deposition is taking place via Zoom video
10:07:14 13 conference. The legal videographer is Aidan Ginn here
10:07:18 14 on behalf of Steno, and the court reporter is
10:07:21 15 Ronny Zavosky, License Number 12359, also here on behalf
10:07:26 16 of Steno.

10:07:27 17 Would counsel please identify yourselves and
10:07:29 18 state whom you represent.

10:07:32 19 MS. HENDERSON: Mari Henderson on behalf of
10:07:34 20 plaintiff, Megan Pete, and joining me in the room is my
10:07:38 21 colleague Julian Schoen.

10:07:43 22 MR. PANCIER: Michael Pancier for the
10:07:45 23 defendant.

10:07:46 24 MR. HAYDEN: Michael Hayden, counsel for
10:07:48 25 defendant and appellant counsel for witness,

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10:07:50 1 Daystar Peterson.

10:07:54 2 THE VIDEOGRAPHER: Thank you, counsel.

10:07:55 3 Would the reporter please swear in the
10:07:56 4 witness.

10:07:56 5 THE COURT REPORTER: Hello. My name is Ronny
10:07:56 6 Zavosky. I am a certified shorthand reporter licensed
10:07:56 7 in the state of California. My license number is 12359.
10:07:56 8 I will now swear in the witness.

10:07:57 9 - - -

10:07:57 10 DAYSTAR PETERSON,
10:07:57 11 having first declared under penalty of perjury to tell
10:07:57 12 the truth, was examined and testified as follows:

10:08:22 13 THE WITNESS: Yes, ma'am.

10:08:22 14 - - -

10:08:22 15 EXAMINATION

10:08:23 16 BY MS. HENDERSON:

10:08:23 17 Q All right. Good morning, Mr. Peterson.

10:08:27 18 A Good morning.

10:08:29 19 Q As I stated already, my name is
10:08:31 20 Mari Henderson. I'm an attorney who represents
10:08:33 21 Ms. Megan Pete in this action.

10:08:36 22 Could I please get you to state your full name
10:08:38 23 for the record.

10:08:40 24 A Daystar Peterson.

10:08:41 25 Q And do you also go by the name of Tory Lanez

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10:08:45 1 professionally?

10:08:46 2 A Yes.

10:08:48 3 Q Now, where are you doing this deposition
10:08:50 4 today?

10:08:52 5 A In prison, Tehachapi CCI.

10:08:55 6 Q Okay. And before we got on the record, we
10:08:57 7 discussed that there's a background behind you, but
10:09:00 8 obviously that's a virtual background and that is not
10:09:03 9 actually the room within which you are taking this
10:09:05 10 deposition; is that right?

10:09:06 11 A Well, I am taking this deposition in this
10:09:08 12 room. The background doesn't change the room.

10:09:11 13 Q Correct. But the -- you would agree that
10:09:13 14 that's a virtual background behind you?

10:09:16 15 A I guess I could agree to that. I don't know
10:09:18 16 what it is. It was placed here before I got here.

10:09:20 17 Q Okay. And how long have you been in Tehachapi
10:09:26 18 prison for?

10:09:27 19 A I would believe about a year and some change.
10:09:30 20 Maybe a year and six months. Something like that.

10:09:33 21 Q Okay. So before we get started with some
10:09:35 22 questions, I'm going to take you through some
10:09:37 23 admonitions.

10:09:38 24 Do you understand that you are giving
10:09:39 25 testimony today under oath, under penalty of perjury?

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10:09:42 1 A I do.

10:09:44 2 Q Do you understand that you are under the same
10:09:46 3 oath today as if you were testifying in court?

10:09:49 4 A I understand.

10:09:51 5 Q I will be asking you questions, and sometimes
10:09:55 6 your counsel, who is Mr. Hayden, might object; but
10:09:59 7 unless your counsel advises you not to answer, you still
10:10:02 8 need to answer my questions.

10:10:03 9 Do you understand that?

10:10:06 10 A No, I don't understand that.

10:10:07 11 Q Okay. So you have counsel with you here today
10:10:11 12 for this deposition; is that correct?

10:10:13 13 A I believe so.

10:10:14 14 Q Okay. And who is your counsel for this
10:10:16 15 deposition today?

10:10:17 16 A Out of all the four faces I'm looking at, I
10:10:21 17 would imagine it's Michael Hayden.

10:10:23 18 Q Okay. And if Mr. Hayden instructs you not
10:10:26 19 to answer a question, then you will not --

10:10:31 20 A I will not be answering.

10:10:31 21 Q -- then you will not be answering. However,
10:10:33 22 there are other objections that he or other counsel may
10:10:36 23 make, and unless you are specifically advised not to
10:10:39 24 answer a question, you understand that you need to
10:10:41 25 answer my question.

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10:10:42 1 Do you understand that?

10:10:44 2 A No. I don't understand.

10:10:46 3 Why you are saying that.

10:10:49 4 MR. HAYDEN: If I -- if I could help. She is
10:10:51 5 just making a record. This is strictly for the record,
10:10:53 6 Mr. Peterson. I will be objecting and instructing you
10:10:56 7 not to answer about anything Fifth Amendment or
10:11:00 8 privileged, if that makes sense.

10:11:03 9 THE WITNESS: Absolutely.

10:11:04 10 BY MS. HENDERSON:

10:11:05 11 Q However, there are other objections he may
10:11:06 12 make like speculation, or assumes facts not in evidence,
10:11:12 13 just as examples. And if he makes that objection, you
10:11:14 14 still need to answer my question.

10:11:16 15 Do you understand?

10:11:17 16 A I don't see why I would answer any question
10:11:19 17 after my lawyer objected to it. I don't understand
10:11:21 18 that.

10:11:23 19 MR. HAYDEN: Well, no, Mr. Peterson. If
10:11:25 20 it's Fifth Amendment privilege, then I will instruct you
10:11:28 21 not to answer because that could self-incriminate you,
10:11:30 22 but if it's a general question like "Is the sky blue,"
10:11:33 23 you can answer that. Even if I object to it, you would
10:11:36 24 answer to it.

10:11:37 25 Does that make sense? Nothing to incriminate

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10:11:39 1 you.

10:11:40 2 THE WITNESS: I understand what you are
10:11:41 3 saying. I just don't understand why I would have to
10:11:44 4 answer to something you objected to. Am I --

10:11:50 5 MR. HAYDEN: I got you. I got you. An
10:11:51 6 objection is stated just for the record. That's --
10:11:55 7 that's your counsel or opposing counsel putting their
10:11:58 8 two cents into why it should be objected for the record.
10:12:01 9 But it's --

10:12:03 10 THE WITNESS: I can -- I can just tell Mari is
10:12:04 11 going to hate me this whole interview. I can just see
10:12:08 12 her face, like, oh, this guy is just going to be
10:12:10 13 difficult.

10:12:10 14 MR. HAYDEN: You are good. You are good.
10:12:11 15 We'll -- we'll get it done.

10:12:13 16 THE WITNESS: Come on. Let's go. Let's go,
10:12:15 17 guys.

10:12:15 18 BY MS. HENDERSON:

10:12:15 19 Q Okay. So moving on from the questions piece
10:12:20 20 of it, we do have a court reporter taking all of this
10:12:24 21 down, and so the result of that will be a written
10:12:27 22 transcript of the deposition. Because of that, it's
10:12:28 23 important that you give audible, verbal answers to my
10:12:32 24 questions to keep things --

10:12:35 25 A Can I ask you a question, Ms. Mari Henderson?

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10:12:38 1 Your name is -- Henderson is the last name?

10:12:40 2 Q Yes.

10:12:40 3 A Is it okay if I call you "Ms. Henderson"?

10:12:44 4 Q Yes.

10:12:45 5 A All right. Ms. Henderson, are you planning on

10:12:48 6 publicizing any of this? I just would like for you to

10:12:51 7 say on record.

10:12:52 8 Q Okay. So, first, I'm going to set some ground

10:12:55 9 rules before I answer your question so you understand

10:12:56 10 how this works. One, I was in the middle of telling you

10:12:58 11 that a court reporter is taking all of this down and

10:13:01 12 there will be a written record. So because of that,

10:13:03 13 first, you need to give verbal --

10:13:05 14 A I --

10:13:05 15 Q -- audible answers, such as "yes" or "no"

10:13:07 16 rather than nodding your head; and, second, and most

10:13:09 17 importantly as exhibited now, you cannot interrupt my

10:13:12 18 questions so that the reporter can get a clear record.

10:13:15 19 So I would ask for you to wait for me to

10:13:17 20 finish my question before you answer, and I will do the

10:13:20 21 same and give you the same courtesy. Also, as your

10:13:23 22 attorney will advise you, I am the one asking questions

10:13:26 23 today. However, I will provide you with the admonition

10:13:29 24 that this deposition is subject to a protective order --

10:13:33 25 A One more thing: Do I have my First Amendment

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10:13:35 1 right -- freedom of speech?

10:13:38 2 MR. HAYDEN: You have -- you have your
10:13:38 3 First Amendment right, freedom of speech, but you
10:13:40 4 also --

10:13:41 5 THE WITNESS: Then why am I not allowed to ask
10:13:43 6 her a question?

10:13:44 7 MR. HAYDEN: Well - well, this is just
10:13:44 8 proceedings. She's just explaining the rules of how a
10:13:47 9 deposition operates.

10:13:48 10 THE WITNESS: She's explaining them as if I'm
10:13:49 11 not allowed to ask a question or say anything. I just
10:13:51 12 would like to know.

10:13:53 13 MR. HAYDEN: Well, right now you are a witness
10:13:55 14 being questioned, and it's my job to object if there's
10:13:57 15 anything that is going to incriminate you and that's
10:13:59 16 what I'm going to do. So she's entitled to ask
10:14:01 17 whatever --

10:14:02 18 THE WITNESS: I understand that. I understand
10:14:04 19 that, Michael Hayden.

10:14:05 20 I guess what my question is -- is, like, does
10:14:07 21 that prohibit me from being able to ask a question?

10:14:09 22 MR. HAYDEN: We can take breaks, and you can
10:14:10 23 ask questions administratively, but in the -- in the
10:14:13 24 line of questioning, we have to let her -- we have to
10:14:17 25 let opposing counsel --

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10:14:18 1 THE WITNESS: Oh, given that we let her ask
10:14:20 2 all the questions she wants to ask, she can ask
10:14:21 3 questions until her face turns blue. I'm just asking,
10:14:22 4 am I allowed to ask her a question?
10:14:27 5 MR. HAYDEN: You can't ask her questions --
10:14:28 6 THE WITNESS: Does anything that she is saying
10:14:31 7 prohibit me from asking a question?
10:14:33 8 MR. HAYDEN: You can't -- you can't respond to
10:14:34 9 a question with a question. I can object and I can
10:14:37 10 instruct you not to answer; but anything she asks, even
10:14:40 11 if I object to it and don't instruct you not to answer,
10:14:42 12 you have to answer. But later --
10:14:44 13 THE WITNESS: I understand.
10:14:45 14 MR. HAYDEN: Yeah. It's just a procedure.
10:14:47 15 THE WITNESS: Understandable.
10:14:47 16 So in a time like this, when I'm asking her a
10:14:49 17 simple question about whether or not this is going to be
10:14:53 18 publicized or not, it's not coming from me responding to
10:14:56 19 a question she asked me. I'm asking her a simple
10:14:58 20 question: Am I prohibited from asking her a simple
10:15:01 21 question? Not answering back to her question, but am I
10:15:04 22 prohibited from asking Ms. Henderson a question?
10:15:07 23 MR. HAYDEN: I'll let her answer -- I'll let
10:15:08 24 her answer that right now. She can answer it.
10:15:09 25 BY MS. HENDERSON:

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10:15:10 1 Q So I am providing you admonitions and ground
10:15:12 2 rules as to how this deposition is working, and before
10:15:15 3 you cut me off, I was in the middle of answering the
10:15:18 4 question that you did ask.

10:15:18 5 If you want to proceed with this deposition by
10:15:20 6 asking me questions rather than answers, the record will
10:15:22 7 reflect that; but as a courtesy to the court reporter, I
10:15:25 8 ask that you not interrupt and wait for us to finish our
10:15:28 9 question and/or, in this instance, my answer before you
10:15:31 10 answer.

10:15:31 11 And so, as you were asking, there is a
10:15:34 12 protective order in this case. As your counsel either
10:15:37 13 has or will explain to you, that designates this
10:15:42 14 deposition as highly confidential for the first 30 days,
10:15:44 15 and then counsel can seek to de-designate the
10:15:47 16 deposition.

10:15:49 17 Any other questions you have, I direct you to
10:15:51 18 ask your counsel those questions.

10:15:53 19 Do you understand?

10:15:54 20 A Well, my counsel wouldn't be the one leaking
10:15:56 21 the video, so I think it's better said for you. No?

10:16:00 22 Q I'm not going to respond to that with any sort
10:16:02 23 of --

10:16:05 24 A Any sort of -- sipping of water?

10:16:07 25 Q I see what you are doing. I see what you are

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10:16:07 1 doing, Mr. Peterson.

10:16:10 2 A I see what you are doing too.

10:16:11 3 Q I know this is fun for you.

10:16:13 4 MR. HAYDEN: We know the concern. We
10:16:14 5 understand the concern. It's -- it's, you know, but
10:16:16 6 we --

10:16:18 7 THE WITNESS: I just want her to tell the
10:16:19 8 truth. Like, that is what this deposition is for. It's
10:16:21 9 for you guys to get me on video to -- you know, to do
10:16:24 10 what you guys have been doing for the last couple of
10:16:26 11 years -- to -- to -- to fake some sort of narrative.
10:16:28 12 But go ahead.

10:16:30 13 BY MS. HENDERSON:

10:16:30 14 Q Okay. If you answer a question,
10:16:35 15 Mr. Peterson, myself and anyone who reads the
10:16:37 16 deposition transcript will assume that you understood
10:16:40 17 the question.

10:16:40 18 Do you understand that?

10:16:43 19 A No.

10:16:45 20 Q Okay. So if you don't understand a question,
10:16:50 21 will you ask for clarification?

10:16:52 22 A Depending on how I feel at that moment.

10:16:55 23 Q Okay. As your counsel already told you, we
10:16:57 24 can take a break at any time, except we can't break
10:17:00 25 while a question is pending. So you need to answer my

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10:17:03 1 question before we take a break.

10:17:05 2 Do you understand that?

10:17:06 3 A I would like no breaks. Kevin Gates, "I Don't
10:17:10 4 Get Tired."

10:17:10 5 Q Well, unfortunately, for our court reporter,
10:17:12 6 who is diligently taking down the record, she will be
10:17:15 7 requesting breaks.

10:17:15 8 Do you understand that?

10:17:16 9 A Hey, for Ronny's sake, she can get as many
10:17:19 10 breaks as she wants. She's a very pleasant lady.

10:17:22 11 Q Have you taken any drugs or medication that
10:17:24 12 could impair your ability to hear, understand, or answer
10:17:27 13 my questions truthfully today?

10:17:29 14 A Absolutely not.

10:17:32 15 Q If I refer to Ms. Pete as "Megan Thee
10:17:34 16 Stallion," do you understand that to be the same person?

10:17:38 17 A I would like for you to refer to her as her
10:17:40 18 regular name that you are putting on the file. I
10:17:42 19 wouldn't like you to refer to anybody as their aliases
10:17:45 20 or anything, as this is a deposition that requires that
10:17:47 21 professionalism [sic]. So I would like for you to just
10:17:50 22 like say her name as it is on file.

10:17:52 23 Q Okay. That's not exactly my question.

10:17:53 24 My question is, if I refer to her as "Megan
10:17:56 25 Thee Stallion" --

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10:17:57 1 A I answered.

10:17:58 2 Q -- do you understand her --

10:17:59 3 A I answered.

10:17:59 4 Q -- as a person?

10:18:00 5 A That's my answer, so...

10:18:01 6 Q Okay. We have a record of that.

10:18:15 7 MR. HAYDEN: Mr. Peterson, if I may, in a --

10:18:16 8 in a document or a piece of evidence, it may refer to

10:18:19 9 her as "Megan Thee Stallion." That's why -- that's why

10:18:22 10 counsel is suggesting that. That's the only reason.

10:18:24 11 THE WITNESS: Well, I'm asking Counsel to
10:18:26 12 clarify and make sure that they say her regular name.

10:18:29 13 MR. HAYDEN: Noted.

10:18:30 14 THE WITNESS: Thank you.

10:18:34 15 BY MS. HENDERSON:

10:18:34 16 Q And as Mr. Hayden explained, there may be
10:18:37 17 documents that refer to "Megan Thee Stallion."

10:18:39 18 So my question to you, again, is do you
10:18:40 19 understand that Ms. Pete also goes professionally as
10:18:43 20 "Megan Thee Stallion"?

10:18:45 21 A Are you telling me, or are you asking me?

10:18:47 22 Q I'm asking you. Do you know whether Ms. Pete
10:18:49 23 is also professionally known as "Megan Thee Stallion"?

10:18:52 24 A There's a lot of Ms. Petes in this world.

10:18:54 25 Which Ms. Pete are you talking about?

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10:18:56 1 Q Okay. Megan Pete. Do you understand her to
10:18:59 2 also be known as "Megan Thee Stallion"?
10:19:00 3 THE WITNESS: Hey, Michael Hayden, if it's
10:19:02 4 possible, could you Google how many Megan Petes there
10:19:05 5 are in the world?
10:19:06 6 MR. HAYDEN: Well, no. She's just asking for
10:19:07 7 a nexus between the Megan Pete in this case -- the
10:19:11 8 plaintiff in this case, in this specific case, and going
10:19:14 9 by the professional moniker of "Megan Thee Stallion."
10:19:16 10 It's not a trick or anything. Believe me. She's just
10:19:17 11 trying to --
10:19:19 12 THE WITNESS: I didn't think it was. I was
10:19:19 13 just asking her to clarify her --
10:19:21 14 MR. HAYDEN: I'm just trying to speed -- speed
10:19:22 15 things up a little bit. I mean, we can, you know, give
10:19:24 16 them --
10:19:24 17 THE WITNESS: No. We have all day. I have
10:19:26 18 10 years in here. I got --
10:19:28 19 MR. HAYDEN: I got you. I'm on your side. I
10:19:30 20 got you.
10:19:31 21 THE WITNESS: We got all day.
10:19:32 22 BY MS. HENDERSON:
10:19:33 23 Q Yep, we do. We do have all seven hours on the
10:19:35 24 record, and if you'd like to use all of it, I am here to
10:19:38 25 use them.

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10:19:38 1 A I would love to use them all -- use all seven.

10:19:40 2 Q I am sure you do. All right.

10:19:41 3 A All seven.

10:19:43 4 Q You know what? Before I go to my questions

10:19:47 5 and the rest of the admonitions -- I'm done with the

10:19:57 6 admonitions. But before I go to my questions, are you

10:20:01 7 aware that Unite The People released a statement to the

10:20:04 8 media regarding your deposition here today?

10:20:07 9 A I'm unaware.

10:20:08 10 Q You are unaware of that? Okay.

10:20:11 11 Did you --

10:20:12 12 A I don't even know if that's -- I don't even

10:20:14 13 know if that's true.

10:20:15 14 Q Okay. Did you discuss or authorize or approve

10:20:22 15 any statement made by Unite The People regarding your

10:20:25 16 deposition today?

10:20:28 17 A I'm sorry. Reiterate that question.

10:20:30 18 Q Did you discuss, approve, or authorize any

10:20:34 19 statement made by Unite The People regarding your

10:20:37 20 deposition here today?

10:20:39 21 A I would like the definitions of "discuss,

10:20:41 22 approve," and whatever you said.

10:20:43 23 Can you give me those, please.

10:20:45 24 Q Okay. So my -- you don't understand the word

10:20:47 25 "discuss"?

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10:20:48 1 A No. But I would like the definitions. I want
10:20:50 2 your definition because you are asking me the questions.
10:20:53 3 So I would like your definitions, Ms. Henderson. Thank
10:20:56 4 you.
10:20:56 5 Q Okay. So did you speak with or talk to anyone
10:20:58 6 at Unite The People about your deposition?
10:21:00 7 A No. I'm asking you for the definition of
10:21:02 8 "discuss."
10:21:03 9 Can you give me that, please, from "Webster"?
10:21:05 10 Q I'm the one asking questions, so I'm going
10:21:07 11 to --
10:21:09 12 A I need to comprehend them.
10:21:11 13 Q This is unresponsive.
10:21:12 14 A Am I tripping, or do I not need to understand
10:21:12 15 everything she says?
10:21:15 16 Q Okay.
10:21:16 17 A I need to understand it; correct? Am I -- am
10:21:18 18 I "mugging"? Yeah. I need to know what she's saying.
10:21:22 19 Q So you do understand that this deposition may
10:21:24 20 be played in front of a jury and they will be watching
10:21:26 21 this, and so if you wanted to leave the record as you
10:21:30 22 don't understand my question --
10:21:31 23 A Absolutely.
10:21:31 24 Q -- I --
10:21:32 25 A I'm not leaving the record as I don't

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10:21:33 1 understand you. You are talking over me when you asked
10:21:36 2 me not the cut you off. I'm not -- I'm not saying I
10:21:39 3 don't understand. I'm asking you to clarify. There are
10:21:41 4 two big differences in clarifying and not understanding.

10:21:44 5 Q Okay. I will clarify --

10:21:45 6 A In fact, I would believe that clarifying is so
10:21:49 7 that you can understand more.

10:21:51 8 Am I wrong, guys?

10:21:54 9 Q Mr. Peterson, did you talk to anyone at
10:21:56 10 Unite The People about a statement regarding your
10:21:58 11 deposition?

10:22:00 12 A You still have not given me the definitions of
10:22:04 13 the words that you first asked. And I'm asking for
10:22:07 14 those so I can give you a clear and understandable
10:22:10 15 answer.

10:22:10 16 Q Okay. My question was: Did you talk to
10:22:12 17 anyone at Unite The People about a statement regarding
10:22:15 18 your deposition?

10:22:17 19 A That wasn't your question. I would like for
10:22:18 20 you to --

10:22:19 21 Q That's my question now.

10:22:19 22 A I would like you to ask the question the way
10:22:22 23 that you first asked the question. I'm supposed to
10:22:22 24 answer the question.

10:22:22 25 Q I am going to move -- I'm going to move to

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10:22:23 1 strike as non-responsive, and I'm going to move on.

10:22:27 2 A I responded. You didn't -- you just -- don't
10:22:30 3 strike it.

10:22:31 4 MS. HENDERSON: I'm going to mark as next in
10:22:34 5 order --

10:22:36 6 THE WITNESS: I want this to be known on
10:22:38 7 record that I don't trust this woman. I know that the
10:22:41 8 fact that these people are the same people who have me
10:22:45 9 in prison wrongfully convicted of a crime that I did not
10:22:48 10 commit, that no physical evidence even says that I have.
10:22:52 11 I don't trust this woman.

10:22:54 12 So when I'm asking for a clarification on
10:22:56 13 things, it's not because I'm trying to be difficult or
10:23:02 14 extra of any sort. I just have to fine-comb everything.
10:23:07 15 Because the people that this woman works for are
10:23:09 16 despicable, and they do things at the expense of someone
10:23:16 17 else's freedom for their own personal gain. So I don't
10:23:20 18 trust this woman.

10:23:22 19 So if I seem like I'm coming off in any kind
10:23:24 20 of way, I'm trying to be as respectful as I can. I just
10:23:28 21 want all the clarity. And if that comes off to anybody
10:23:32 22 like -- I'm doing something that's undermining or some
10:23:36 23 sort of way like that, I apologize. But I just want my
10:23:38 24 clarity.

10:23:39 25 So, Ms. Henderson, I'm just letting you know

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10:23:42 1 that's where the basis of my questions come from when
10:23:45 2 I'm asking you to clarify things.

10:23:48 3 BY MS. HENDERSON:

10:23:48 4 Q Okay. Well, my question before you stated
10:23:49 5 that was: Did you talk to anyone at Unite The People
10:23:53 6 about a statement regarding your deposition. And so I
10:23:56 7 will be moving to strike the answer as nonresponsive.

10:23:59 8 MS. HENDERSON: And now, I would like to move
10:24:00 9 on by marking as next in order, which I believe, Ronny,
10:24:05 10 is Exhibit 39. I'm going to ask the tech to pull up
10:24:16 11 Tab 2.

10:24:20 12 (Exhibit 39 was marked for identification.)

10:24:33 13 BY MS. HENDERSON:

10:24:33 14 Q And I'd like you to scroll down to the next
10:24:35 15 page.

10:24:38 16 Okay.

10:24:39 17 And if -- for purposes of everyone, if you
10:24:41 18 could zoom in. Okay.

10:24:46 19 Mr. Peterson, do you see that this is a
10:24:48 20 statement titled "Unite The People Inc. CEO
10:24:52 21 Ceasar McDowell Sets The Record Straight On Deposition
10:24:54 22 In Re Tory Lanez"?

10:24:57 23 Do you see that?

10:24:58 24 A I'm sorry. The -- the way that this screen
10:24:59 25 is, like it's just so small. I can't see anything.

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10:25:05 1 MS. HENDERSON: Mr. Ginn, if you could zoom
10:25:09 2 in.
10:25:10 3 THE WITNESS: I know you think that's solving
10:25:11 4 the problem, but I swear on my side it's not.
10:25:14 5 Can you just read me whatever document that
10:25:17 6 you are talking about, please.
10:25:17 7 BY MS. HENDERSON:
10:25:18 8 Q Okay. I will read you the document, but if
10:25:20 9 you'd like to take a break so that you can change the
10:25:23 10 settings of your zoom --
10:25:24 11 A I can't change the settings. I'm in prison
10:25:27 12 and this is their equipment. I'm not going to get a
10:25:29 13 write-up for touching their equipment. I am not allowed
10:25:32 14 to.
10:25:32 15 Q I understand.
10:25:33 16 My question is: Do you see any document in
10:25:35 17 front of the screen, or do you see no document?
10:25:37 18 A I see a bunch of words, but I cannot make out
10:25:39 19 what they are because they're too small, and I guess
10:25:41 20 it's just the way this screen is setup; so I'm asking
10:25:44 21 you if maybe you can just read whatever it is that you
10:25:45 22 are talking about.
10:25:46 23 Q Okay. So this is a statement titled "Unite
10:25:51 24 The People Inc. CEO Ceasar McDowell Sets The Record
10:25:54 25 Straight On Deposition In Re Tory Lanez." And this

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10:25:58 1 statement reads, in part, "Tory Lanez is not a party to
10:26:03 2 Megan Thee Stallion's lawsuit against UTP client
10:26:07 3 Milagro Cooper and therefore UTP is not obligated to
10:26:11 4 produce Tory Lanez for a deposition, nor did UTP agree
10:26:16 5 or disagree to a deposition of Mr. Lanez or any other
10:26:18 6 potential witness."

10:26:19 7 Are -- showing you that statement, are you
10:26:25 8 aware that UTP released that statement?

10:26:27 9 A You are not showing me anything because I
10:26:29 10 can't see what you are talking about. However, I mean,
10:26:32 11 you are saying -- you are saying "Am I aware?" Again,
10:26:36 12 I'm not aware of anything, and I can't see what you are
10:26:38 13 talking about.

10:26:39 14 Q Okay. If you can't see what I'm talking
10:26:40 15 about, then why don't we take a break, go off the
10:26:43 16 record, and we will contact the prison to change the
10:26:46 17 settings so you can see these exhibits.

10:26:49 18 A Okay.

10:26:51 19 THE VIDEOGRAPHER: We're now off the record.
10:26:52 20 The time is 10:26 AM Pacific time.

10:26:55 21 (Recess taken.)

10:30:11 22 THE VIDEOGRAPHER: We are now on the record.
10:32:00 23 Time is 10:32 AM Pacific time.

10:32:03 24 MS. HENDERSON: Okay. So over the break, we
10:32:05 25 had Counselor Hernandez, who works at the prison, come

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10:32:10 1 in and check the settings on the computer, and we pulled
10:32:13 2 up the same document, Exhibit 39, and asked if he could
10:32:18 3 read it. He confirmed it was legible and that he could
10:32:22 4 see the document, and he read the first lines of the
10:32:27 5 document.

10:32:28 6 So I'm going to pull up Exhibit 39 back on the
10:32:31 7 screen, and if you could zoom in on the second page,
10:32:37 8 Mr. Ginn.

10:32:40 9 BY MS. HENDERSON:

10:32:40 10 Q Mr. Peterson, the very last paragraph of
10:32:44 11 this statement says, "Lastly, if you know Tory Lanez how
10:32:49 12 I do, good luck trying to get him to, quote, 'testify'
10:32:52 13 to anything. It's just not what he does... and he
10:32:56 14 definitely did not, quote, 'agree' to testify now."

10:33:01 15 A I don't know that that says that. Still you
10:33:03 16 pulled up the same thing, at the same size, and I still
10:33:06 17 can't read it. You asked somebody else for their
10:33:08 18 opinion on whether they can read it. That person has
10:33:10 19 glasses on their face, and that person is standing right
10:33:13 20 next to the screen. You asked them not only to read
10:33:16 21 something here. You asked him to read the most boldest
10:33:19 22 part of this and not anything else.

10:33:22 23 So, again, you lose. I'm sorry.

10:33:25 24 Q Okay. So the -- I'm just asking, can -- can
10:33:28 25 you hear me all right, Mr. Peterson?

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10:33:31 1 A Sometimes.

10:33:32 2 Q Okay. Can you hear me when I say that there
10:33:36 3 was a statement released that said, "Lastly, if you know
10:33:39 4 Tory Lanez how I do, good luck trying to get him to
10:33:42 5 testify to" --

10:33:44 6 A I cannot see that statement so I cannot attest
10:33:46 7 to whatever you are talking about. I'm sorry.

10:33:48 8 Q All right. That's not my question.

10:33:49 9 My question was: Can you hear me when I say,
10:33:51 10 "Lastly, if you know Tory Lanez how I do, good luck
10:33:56 11 trying to get him to testify to anything. It's just not
10:33:58 12 what he does."

10:33:59 13 Can you hear that?

10:34:00 14 A I can hear you.

10:34:01 15 Q Okay. And will you agree that's what you are
10:34:02 16 doing today, right now?

10:34:05 17 A Would I agree that I'm doing what today right
10:34:07 18 now?

10:34:08 19 Q Are you evading the testimony right now?

10:34:11 20 A Evading the testimony? I think I'm here for a
10:34:14 21 testimony.

10:34:15 22 THE WITNESS: Michael, is this not a hearing?

10:34:17 23 MR. HAYDEN: This is a hearing.

10:34:18 24 THE WITNESS: Is this not a testimony I'm
10:34:20 25 doing?

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10:34:20 1 BY MS. HENDERSON:

10:34:21 2 Q Okay. And Mr. --

10:34:24 3 A Excuse me. Excuse me. Excuse me,

10:34:24 4 Ms. Henderson, I'm talking to my lawyer.

10:34:26 5 THE WITNESS: Michael -- Michael Hayden is
10:34:27 6 this not a testimony that I'm doing right now?

10:34:29 7 MR. HAYDEN: Well, it's a deposition. You
10:34:31 8 have to answer the questions --

10:34:33 9 THE WITNESS: But in some sort of way, my
10:34:35 10 words will make up what they call a testimony --
10:34:37 11 correct? -- because I'm under oath.

10:34:41 12 MR. HAYDEN: Exactly.

10:34:42 13 THE WITNESS: Or am I wrong? Am I wrong?

10:34:45 14 MR. HAYDEN: You are partially right. But at
10:34:46 15 the same time we have --

10:34:47 16 THE WITNESS: So when she asks me -- so when
10:34:48 17 she asks me am I evading the testimony, what does that
10:34:51 18 mean?

10:34:53 19 MR. HAYDEN: You are not answering the
10:34:54 20 questions being asked is what she means.

10:34:57 21 THE WITNESS: So -- okay. So explain this
10:34:59 22 again, Ms. Henderson.

10:35:01 23 MR. HAYDEN: If you can't see it and you have
10:35:02 24 no personal knowledge -- or if you have no personal
10:35:03 25 knowledge of it, you just say "No," you know, if you've

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10:35:07 1 never seen this.

10:35:07 2 BY MS. HENDERSON:

10:35:08 3 Q And that's not my question. And, in fact, we
10:35:09 4 can put down Exhibit 39.

10:35:16 5 Mr. Peterson, did you know that Unite The
10:35:19 6 People put out a statement that read: "If you know Tory
10:35:24 7 Lanez how I do, good luck trying to get him to testify
10:35:28 8 to anything. It's just not what he does."

10:35:33 9 A I do not recall.

10:35:35 10 Q Okay. So you don't recall one way or the
10:35:37 11 other whether Unite The People released that?

10:35:39 12 A You are adding extra things to what I said. I
10:35:41 13 said, "I don't recall."

10:35:43 14 Q Okay. So my question is: You do not recall
10:35:46 15 one way or the other whether Unite The People released a
10:35:49 16 statement regarding your testimony here today?

10:35:53 17 A I do not recall.

10:35:55 18 Q Okay. Mr. Peterson, if I refer to the
10:36:02 19 defendant in this action --

10:36:04 20 A How come I can't see myself? I'd like to look
10:36:09 21 at myself.

10:36:11 22 Q Okay.

10:36:11 23 A I'd like to see the trees behind me.

10:36:14 24 Q Okay.

10:36:15 25 A Makes me feel good. Makes me feel like --

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10:36:15 1 Q So then let's -- let's take a break and go off
10:36:18 2 the record and get Mr. Hernandez --

10:36:18 3 A We don't need to go off the record. I would
10:36:20 4 like to see myself in the camera. I don't know why I
10:36:24 5 can't see the actions that my body is doing, if I'm
10:36:27 6 being recorded.

10:36:29 7 THE WITNESS: Mr. Hayden, am I wrong? I
10:36:30 8 mean, shouldn't I be able to see myself?

10:36:32 9 MR. HAYDEN: I'm not sure. I'm not sure if
10:36:34 10 it's in the scope of the rules, but --

10:36:38 11 THE WITNESS: They had me seeing myself
10:36:39 12 before. I was looking pretty good. Pretty damn good,
10:36:42 13 if you ask me.

10:36:43 14 MS. HENDERSON: Okay. I'm going to go off the
10:36:44 15 record.

10:36:47 16 THE VIDEOGRAPHER: All right. We're now off
10:36:48 17 the record. Time is 10:36 AM Pacific time.

10:36:51 18 (Recess taken.)

10:39:27 19 THE VIDEOGRAPHER: We are now on the record.
10:39:31 20 Time is 10:39 AM Pacific time.

10:39:34 21 BY MS. HENDERSON:

10:39:35 22 Q Okay. So my last question, which I did not
10:39:37 23 get through before you interrupted was, if I refer to
10:39:39 24 the defendant in this action as "Milagro" or
10:39:42 25 "Ms. Cooper," do you understand that to be the same

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10:39:44 1 person?

10:39:45 2 A Yes.

10:39:46 3 Q Okay. Have you ever been deposed before?

10:39:51 4 A Have I ever been what?

10:39:53 5 Q Deposed before?

10:39:55 6 A I think so.

10:39:56 7 Q Have you ever been in a deposition like we're

10:40:01 8 doing today? Have you ever done a deposition like this

10:40:04 9 before?

10:40:05 10 A I'm not sure. I think so, though.

10:40:06 11 Q Okay. When you say you think so --

10:40:09 12 A I think so. That's -- I don't know else how

10:40:11 13 to explain I think so, but I think so.

10:40:13 14 Q Okay. In what case?

10:40:16 15 A You are a lawyer, Ms. Henderson. Let's be

10:40:18 16 real. Let's be smart. Come on.

10:40:21 17 Q In -- in what case? In what case were you

10:40:22 18 deposed?

10:40:24 19 A I don't know. That's why I said I think so.

10:40:26 20 That's what -- like, don't you know the definition of "I

10:40:28 21 this so." I get it. You're not good with depositions.

10:40:31 22 You didn't want to give me the definition to the other

10:40:34 23 shit either.

10:40:36 24 Q In what --

10:40:37 25 A Which is crazy 'cause aren't you a lawyer?

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10:40:40 1 Shouldn't you, like, know definitions? Aren't you good
10:40:42 2 at that?

10:40:43 3 Q So, Mr. Peterson, let me -- let me just tell
10:40:45 4 you that you do understand that you are under the same
10:40:48 5 oath as if you were testifying in trial in court?

10:40:52 6 A Absolutely. And my answers are very accurate,
10:40:54 7 Ms. Henderson. My answers are very accurate.

10:40:57 8 Q Okay. And I'm just going to tell you if there
10:40:59 9 were a judge here today and you were testifying like
10:41:01 10 this on the stand, then the judge would -- would you
10:41:05 11 like to take a break to understand the -- what's going
10:41:09 12 on here and questions --

10:41:11 13 A Ms. Henderson --

10:41:11 14 Q -- or are we going to go back and forth and do
10:41:14 15 this all day?

10:41:14 16 A Hey, Ms. Henderson, I don't need you to tell
10:41:18 17 me what hypotheticals would have happened in court and
10:41:20 18 what a judge would have, hypothetically, said to me.
10:41:21 19 Like, come on, be a lawyer. Do your job. Let's get
10:41:24 20 this over with. Okay? Do your job. That's all.

10:41:26 21 Q Okay. Have you ever testified in court
10:41:28 22 before?

10:41:32 23 A I don't know.

10:41:34 24 Q Okay.

10:41:34 25 A I don't know if a deposition is a court thing.

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10:41:37 1 I don't know. You asked me if I've ever was deposed
10:41:40 2 before this so I just don't know. I think so.

10:41:42 3 Q Have you ever testified under oath in any
10:41:44 4 capacity before today?

10:41:46 5 A I think so.

10:41:47 6 Q Okay. And when you say you think so --

10:41:50 7 A I think so.

10:41:51 8 Q -- what do you --

10:41:51 9 A Why do you keep asking for a definition of "I
10:41:54 10 think so"?

10:41:54 11 Q I am asking --

10:41:54 12 A You are a smart woman. You know what I think
10:41:56 13 so means.

10:41:57 14 Q Okay. You need -- you need to let me finish
10:41:59 15 my question before you answer.

10:42:02 16 A Okay.

10:42:03 17 Q When you say that you think you may have
10:42:05 18 testified under oath in the past, what do you recall
10:42:09 19 about that past testimony?

10:42:11 20 A That's why I said, "I think so." I don't
10:42:13 21 remember.

10:42:15 22 Q Okay. So you don't remember about anything
10:42:18 23 about what you've testified in the past?

10:42:21 24 A Hence, the three words -- "I think so."

10:42:25 25 Q Okay. Do you know what case you testified in?

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10:42:29 1 THE WITNESS: Michael Hayden, is she, like,
10:42:32 2 illiterate or something?

10:42:33 3 MR. HAYDEN: No. She's just asking the
10:42:34 4 question if you ever testified before.

10:42:37 5 THE WITNESS: She might be hard of hearing or
10:42:38 6 something. It just doesn't make any sense.

10:42:39 7 Are you hard of hearing, Ms. Henderson?

10:42:42 8 BY MS. HENDERSON:

10:42:44 9 Q Do you know what the subject matter was you
10:42:46 10 testified about before?

10:42:48 11 A So I got to answer your questions, but you
10:42:50 12 don't got to answer mine?

10:42:52 13 Q So --

10:42:53 14 A Are you hard of hearing?

10:42:53 15 MR. HAYDEN: Right now, we have to answer
10:42:58 16 hers, technically.

10:42:59 17 BY MS. HENDERSON:

10:43:00 18 Q I'm going to ask the question once more, and
10:43:01 19 then I'm going to move to strike as nonresponsive.

10:43:04 20 Do you know what the subject matter was that
10:43:05 21 you testified about before?

10:43:08 22 A Not that I can recall.

10:43:10 23 Q Okay. And you chose not to testify at your
10:43:14 24 criminal trial in December of 2022?

10:43:19 25 A You are asking me a legal question that I'm

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10:43:20 1 not answering.

10:43:22 2 Q Okay.

10:43:23 3 A It has nothing to do with this case.

10:43:28 4 MR. HAYDEN: Attorney-client privilege.

10:43:28 5 Instruct not to answer.

10:43:29 6 MS. HENDERSON: Okay. So -- so the record is
10:43:30 7 clear, you -- you objected first, Mr. Peterson, and
10:43:32 8 then your counsel objected.

10:43:34 9 BY MS. HENDERSON:

10:43:34 10 Q I'm just asking --

10:43:36 11 A Is that funny to you then? Ha-ha, that's
10:43:38 12 funny.

10:43:39 13 Is that a lawyer joke or something?

10:43:40 14 BY MS. HENDERSON:

10:43:41 15 Q Did you -- did you testify at your criminal
10:43:43 16 trial?

10:43:43 17 THE WITNESS: Is that a lawyer joke, Mike?

10:43:45 18 MR. HAYDEN: Objection. Fifth Amendment
10:43:47 19 privilege.

10:43:47 20 Instruct the witness not to answer.

10:43:49 21 MS. HENDERSON: Okay. So let me finish my
10:43:50 22 question, and then you can launch your objection,
10:43:52 23 Mr. Hayden.

10:43:53 24 MR. HAYDEN: You finished your objection. I
10:43:55 25 objected right after you finished your question because

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10:43:58 1 I missed the last one.

10:43:59 2 MS. HENDERSON: Okay. I did not finish my

10:43:59 3 question.

10:43:59 4 BY MS. HENDERSON:

10:44:02 5 Q Did you testify at your criminal trial in

10:44:05 6 December of 2022? That's a yes or no.

10:44:09 7 A Objection.

10:44:10 8 Q Okay. I don't see --

10:44:11 9 A Don't ask me anything about -- don't ask me

10:44:13 10 any anything about any criminal proceedings that have to

10:44:15 11 do with my case on a criminal level.

10:44:17 12 How about that?

10:44:19 13 Q I am simply asking, did you testify --

10:44:21 14 A Objection. Objection.

10:44:25 15 Q Okay. Just, again, for the record, you are

10:44:27 16 not answering my questions.

10:44:30 17 A Objection.

10:44:30 18 Q Okay. Let me finish my -- my question so I

10:44:32 19 can have a clear record so --

10:44:34 20 A I object.

10:44:35 21 Q -- we can then bring it to the court to

10:44:38 22 decide.

10:44:38 23 A I object. I object.

10:44:39 24 Q Did you -- did you testify at your criminal

10:44:39 25 trial in December of --

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10:44:39 1 A I object.

10:44:47 2 THE COURT REPORTER: Okay. I can't -- I can't

10:44:48 3 get this when he keeps saying "I object" in between.

10:44:48 4 Like, there's no way I can possibly get this.

10:44:48 5 THE WITNESS: She keeps asking stupid

10:44:48 6 questions, Ronny. I am -- I am trying to help her.

10:44:49 7 MR. HAYDEN: Mr. Peterson, I will object for

10:44:51 8 you, but we have got to wait until she is done with the

10:44:51 9 question, and then I can object like I did the first

10:44:54 10 time. She's just rereading the same question.

10:44:58 11 THE WITNESS: She should have waited to wait

10:44:59 12 for that hair dye. It is the wrong blonde.

10:45:01 13 But anyways, go ahead.

10:45:04 14 BY MS. HENDERSON:

10:45:06 15 Q Did you testify at your criminal trial in

10:45:09 16 December of 2022?

10:45:12 17 MR. HAYDEN: Objection. Fifth Amendment.

10:45:13 18 Instruct the witness not to answer.

10:45:15 19 MS. HENDERSON: Okay. So I'm going to put

10:45:16 20 some cases on, for the record, Mr. Hayden, because my

10:45:19 21 simple question was whether or not he testified. And

10:45:22 22 you do understand that the Fifth Amendment privilege

10:45:24 23 only applies when there's a reasonable cause to fear

10:45:29 24 criminal liability that's United States versus

10:45:30 25 Argomaniz -- and, Ronny, I'll give you the spelling

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10:45:34 1 after -- 925 F.2d 1349, and that must be contingent on
10:45:41 2 the -- it must be sufficiently real that there is a
10:45:44 3 likelihood of prosecution, and that is Englebrick versus
10:45:48 4 Worthington Industries Inc., 670 F.SUPP.2d 1048.

10:45:53 5 And so, Mr. Hayden, is it your position that
10:45:55 6 the question of "Did you testify at your criminal trial
10:45:58 7 in December of 2022" is subject to the Fifth Amendment
10:46:01 8 privilege?

10:46:03 9 MR. HAYDEN: I withdraw. He can answer yes or
10:46:04 10 no, if he has knowledge.

10:46:13 11 BY MS. HENDERSON:

10:46:13 12 Q Mr. Peterson, did you testify at your
10:46:15 13 criminal trial in December of 2022?

10:46:23 14 Okay. Can you hear my question,
10:46:24 15 Mr. Peterson?

10:46:28 16 So he is not responding to the question, for
10:46:31 17 the record. He did confirm earlier he could hear me,
10:46:36 18 and now he is not responding.

10:46:37 19 So, Mr. Peterson, I will ask once more for
10:46:40 20 the record, did you testify at your criminal trial?

10:46:43 21 A Hey, guys, the audio keeps clipping in and
10:46:46 22 out, so sometimes I can't hear what she's saying. It
10:46:48 23 just clipped out. I didn't hear anything she said in
10:46:50 24 the last, like, five seconds.

10:46:53 25 MS. HENDERSON: Okay. Let's go off the record

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10:46:54 1 and get Mr. Hernandez back in.

10:46:58 2 THE WITNESS: It's fine with me, big dog.

10:46:59 3 THE VIDEOGRAPHER: We are off the record.

10:47:00 4 Time is 10:47 AM Pacific time.

10:49:24 5 (Recess taken.)

10:49:29 6 THE VIDEOGRAPHER: We are now on the record.

10:49:30 7 The time is 10:49 AM Pacific time.

10:49:33 8 BY MS. HENDERSON:

10:49:33 9 Q Sorry. Mr. Peterson, what is that you were
10:49:36 10 saying right before we went back on the record?

10:49:38 11 A If it wasn't on the record, it's not
10:49:40 12 important.

10:49:40 13 Q Oh, okay. Were you telling Ronny, the
10:49:41 14 court reporter, that she is the right blonde and did a
10:49:44 15 good job?

10:49:46 16 A I said no such thing.
10:49:47 17 What are you talking about?

10:49:48 18 Q Okay.

10:49:48 19 A Are you putting words in my mouth,
10:49:50 20 Ms. Henderson? This kind of makes me feel scared about
10:49:53 21 the rest of this --

10:49:55 22 THE WITNESS: She just put words in my mouth,
10:49:56 23 Michael Hayden.

10:49:58 24 MR. HAYDEN: I understand. Let's just go
10:49:59 25 forward with the record.

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10:50:00 1 THE WITNESS: How is she allowed to say that?

10:50:03 2 BY MS. HENDERSON:

10:50:03 3 Q Okay. So --

10:50:04 4 THE WITNESS: No, no, no, no, no. She just

10:50:06 5 did something she's not allowed to do. She's not

10:50:08 6 allowed to say what I said or to fake and say that I

10:50:11 7 said something I didn't say. You can't do that.

10:50:13 8 What are you doing?

10:50:15 9 MS. HENDERSON: Okay. I don't want have to

10:50:16 10 bring Ronny, the court reporter, in as a witness.

10:50:19 11 THE WITNESS: Ms. Henderson, what are you --

10:50:19 12 is that what you are doing?

10:50:21 13 MR. HAYDEN: We were off the record. She was

10:50:22 14 making a comment, but we were off the record.

10:50:23 15 THE WITNESS: No, no. Is this what you do in

10:50:25 16 your cases? Is this how you handle your cases? Do you

10:50:28 17 put words in people's mouths?

10:50:29 18 BY MS. HENDERSON:

10:50:30 19 Q So, Mr. Peterson, I'm going to go back to --

10:50:32 20 A So you are skipping what I'm asking you now?

10:50:34 21 Because you just asked me something on record about

10:50:36 22 something that was off record and tried to say

10:50:38 23 something, but you put that in my mouth.

10:50:41 24 I'm asking you, is that how you conduct your

10:50:43 25 services?

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10:50:44 1 Q Mr. Peterson, I am the one asking the
10:50:46 2 questions here today.

10:50:47 3 A Well, I'm clearly asking you questions right
10:50:48 4 now. I mean, you can answer or not. I mean, it's very
10:50:50 5 simple.

10:50:51 6 Q Okay. The question I asked before we went off
10:50:54 7 the record was "Did you testify at your criminal trial
10:50:59 8 in December of 2022." Yes or No?

10:51:02 9 A No.

10:51:03 10 Q Okay. You are being represented here today by
10:51:06 11 Mr. Hayden from Unite The People; right?

10:51:10 12 A Yes.

10:51:11 13 Q You understand that your counsel representing
10:51:13 14 you here today is also Ms. Cooper's attorney in this
10:51:17 15 case?

10:51:18 16 A I'm not really aware of how -- what they do
10:51:22 17 beyond me, but --

10:51:25 18 Q Do you know that Mr. Hayden is also
10:51:27 19 representing --

10:51:28 20 A I said, I'm not aware -- I'm not aware, what
10:51:31 21 they do beyond my scope of me.

10:51:34 22 Q Okay. Did you meet with Mr. Hayden or any
10:51:37 23 other attorneys to prepare for your deposition today?

10:51:44 24 A When you say "meet," what do you mean?

10:51:47 25 Q What does the word "meet" mean to you?

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10:51:49 1 A Well, I would ask you for the "Webster"
10:51:53 2 dictionary version of "meet," if you could explain that
10:51:55 3 to me, just for clarification.
10:51:57 4 Q I'm asking -- I'm asking you the questions.
10:51:57 5 What does the word "meet" --
10:51:58 6 A Well, I don't have --
10:51:59 7 Q -- mean to you?
10:51:59 8 A Well, I don't have -- I don't have access to
10:52:00 9 the same things that you have access to. I'm sure that
10:52:02 10 you are the one asking the questions; so what does
10:52:04 11 "meet" mean?
10:52:05 12 Q Okay. So --
10:52:07 13 A It could mean a lot of things. I mean meat
10:52:09 14 could be a hot dog; meat could be a steak; meat could be
10:52:14 15 red meat. It could be a lot of things. You know what
10:52:16 16 I'm saying? You could watch porn. Meat -- meat is a
10:52:19 17 whole thing different over there. Meet can be anything.
10:52:22 18 I'm asking you what is your definition of "meet."
10:52:25 19 Q Did you talk to Mr. Hayden before your
10:52:27 20 deposition today?
10:52:29 21 A No, I did not.
10:52:30 22 Q Okay. Did you talk to any other attorneys
10:52:32 23 before your deposition today about your deposition?
10:52:37 24 A No.
10:52:38 25 Q Okay. Did you talk to Ceasar McDowell, the

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10:52:46 1 CEO of Unite The People, before your deposition about
10:52:48 2 your deposition?

10:52:52 3 A I don't understand the question you are
10:52:54 4 posing.

10:52:55 5 Q Who is Ceasar McDowell?

10:52:58 6 A Who are you? Like, how do you -- how -- do --
10:53:01 7 do I just put one man in a one definition? Who is this
10:53:05 8 man? I don't know. He probably has many layers to him.
10:53:09 9 I don't know.

10:53:09 10 What exactly do you mean by who is this man?
10:53:12 11 Do you mean who is he spiritually? Do you mean who is
10:53:15 12 he physically? Do you mean who is he personally? Do
10:53:17 13 you mean who is he, like, to me? What do you mean,
10:53:20 14 Ms. Henderson? Please, clarify.

10:53:23 15 Q Ceasar McDowell -- Ceasar McDowell is the CEO
10:53:25 16 of Unite The People; is that right?

10:53:26 17 A Well, if you knew who he was, then why are you
10:53:29 18 asking me? What the fuck?

10:53:31 19 Q I'm not --

10:53:32 20 A What the --

10:53:33 21 Q -- my question --

10:53:34 22 A Why are you asking me? If you knew who this
10:53:37 23 guy was, why are you asking me who he is? You know
10:53:40 24 already.

10:53:40 25 Q I'm going to move to strike as nonresponsive.

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10:53:42 1 My question is, Ceasar McDowell is the CEO of
10:53:50 2 Unite The People; is that right?

10:53:50 3 A I mean, I'll let you tell it. You clearly
10:53:53 4 know him.

10:53:53 5 Q Okay. Are you refusing to answer my question?

10:53:56 6 A No. That was my answer. I'll let you tell
10:53:57 7 it. You clearly know him. That is my answer. Put it
10:53:58 8 on file.

10:53:59 9 Thank you, Ronny.

10:54:00 10 Q Okay. Did you talk to Ceasar McDowell before
10:54:03 11 your deposition about your deposition?

10:54:08 12 A Not that I can recall.

10:54:09 13 Q Okay. Did you speak with anyone to prepare
10:54:12 14 for your deposition today?

10:54:15 15 A No. I don't recall.

10:54:16 16 Q Did you speak with your dad, Sonstar Peterson,
10:54:20 17 about your deposition?

10:54:24 18 A I don't recall.

10:54:25 19 Q Okay. You don't recall one way or the other
10:54:27 20 whether you spoke to your dad about your deposition
10:54:29 21 today?

10:54:31 22 A At this very moment, my brain slipped and I do
10:54:33 23 not recall.

10:54:34 24 Q Okay. Did you speak with your dad,
10:54:35 25 Sonstar Peterson, about his deposition?

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10:54:41 1 A I don't recall.

10:54:42 2 Q Okay. Did you know that your dad,
10:54:45 3 Sonstar Peterson, was also deposed in this case?

10:54:49 4 A I don't know.

10:54:51 5 Q Okay. If your dad, Sonstar Peterson, said he
10:54:54 6 spoke to you about his deposition, do you have any
10:54:56 7 reason to dispute what your dad is saying?

10:54:59 8 A If he said it to me, I just don't recall at
10:55:02 9 this moment that conversation. It could have happened;
10:55:04 10 it could have not happened. I just don't recall.

10:55:06 11 Q Okay. So you don't recall whether, since
10:55:09 12 Friday, you've had any conversations with your dad about
10:55:12 13 the fact that he was deposed in this case? That's your
10:55:14 14 testimony?

10:55:15 15 A Ms. Henderson, I'm in prison. There's a lot
10:55:17 16 of things going on, and I do not recall that right now,
10:55:19 17 amongst the other things that I have to deal with on a
10:55:22 18 daily basis.

10:55:23 19 Q Okay. Did you review any documents to prepare
10:55:25 20 for your deposition today?

10:55:28 21 A I'm sorry?

10:55:28 22 Q Did you review any documents to prepare for
10:55:31 23 your deposition today?

10:55:33 24 A Did you review the documents on the color of
10:55:37 25 the dye you were going to use for your hair?

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10:55:40 1 Q I move to strike as nonresponsive.

10:55:42 2 I'm going to ask again --

10:55:43 3 A That's a real answer. I don't understand.

10:55:46 4 That's a true answer.

10:55:47 5 Q -- did you review any --

10:55:48 6 A Why are you -- why are you striking what I'm
10:55:50 7 saying, if these are my answers?

10:55:51 8 Q So my question to you is, did you --

10:55:54 9 A You are striking my answers. Why? Why are
10:55:57 10 you striking my answers, Ms. Henderson? Can you explain
10:56:00 11 that to me?

10:56:01 12 Q Let me ask my question, for Ronny's sake,
10:56:03 13 before you answer.

10:56:05 14 Did you review any documents to prepare for
10:56:06 15 your deposition today?

10:56:08 16 A But you didn't answer my question, and I feel
10:56:11 17 like it's starting to be -- like it's one-sided. Like,
10:56:12 18 you are not allowing me to -- to understand what I need
10:56:15 19 to understand so I can understand.

10:56:17 20 Q So Mr. Peterson --

10:56:19 21 A Because your hair is distracting me. There's
10:56:21 22 a reason for what I am asking. Your hair is distracting
10:56:24 23 me.

10:56:24 24 MS. HENDERSON: Okay. I'm going to go off the
10:56:26 25 record and stop this deposition at this point. Let's

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10:56:30 1 take a 5-minute break -- a 10-minute break.

10:56:36 2 THE WITNESS: Enjoy yourself.

10:56:38 3 THE VIDEOGRAPHER: It's 10:56 AM Pacific time,

10:56:40 4 and we are off the record.

10:56:41 5 (Recess taken.)

11:01:40 6 THE VIDEOGRAPHER: We are now on the record.

11:01:48 7 The time is 11:01 AM --

11:01:48 8 (Multiple Simultaneous Speakers.)

11:01:49 9 THE WITNESS: I just want to say -- I just

11:01:50 10 want to say on record that Ms. Henderson's hair is

11:01:52 11 distracting me.

11:01:56 12 BY MS. HENDERSON:

11:01:56 13 Q Okay. So before we went off the record, my

11:01:59 14 question to you was did you review any documents to

11:02:02 15 prepare for today's deposition?

11:02:08 16 A I don't -- I understand.

11:02:10 17 Can you say that question again?

11:02:12 18 Q Did you review any documents to prepare for

11:02:14 19 today's deposition?

11:02:15 20 A Did I review? What do you mean by "review"?

11:02:20 21 Q What does the word "review" mean to you?

11:02:23 22 A What does it mean to you? So I can answer

11:02:25 23 your question clearly.

11:02:26 24 Q Okay. Did you look at any documents to

11:02:31 25 prepare for your deposition today?

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11:02:33 1 A What does the word "look" mean to you?

11:02:35 2 Q What does the word "look" mean to you?

11:02:39 3 A It means, I guess, looking at something. But

11:02:42 4 what does it mean to you, though, in the context you are

11:02:44 5 asking?

11:02:45 6 Q Okay. Did you look at any documents to

11:02:47 7 prepare for this deposition today?

11:02:50 8 A You are asking the same question --

11:02:52 9 MR. HAYDEN: You are not getting out of this

11:02:53 10 one.

11:02:54 11 THE WITNESS: Fine.

11:02:56 12 No.

11:03:06 13 How come we can't see the other person that's

11:03:08 14 in your room?

11:03:09 15 BY MS. HENDERSON:

11:03:09 16 Q Did you do anything to prepare for your

11:03:11 17 deposition today?

11:03:14 18 A Is there a second lawyer present?

11:03:16 19 Q I'm asking you, did you do anything to prepare

11:03:18 20 for your deposition today?

11:03:21 21 A One second. I will answer your question

11:03:22 22 shortly.

11:03:23 23 THE WITNESS: Michael Hayden, does she have a

11:03:25 24 second lawyer present?

11:03:26 25 MR. HAYDEN: I wouldn't know. I am remote --

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11:03:28 1 I'm remote as well, just like you. If she does, they're
11:03:31 2 from the same law firm, the same -- the same legal
11:03:35 3 counsel.

11:03:37 4 THE WITNESS: Can I see that person?

11:03:38 5 MR. HAYDEN: I can't.

11:03:39 6 BY MS. HENDERSON:

11:03:39 7 Q I'm going to ask once more, did you do
11:03:41 8 anything to prepare for your deposition?

11:03:43 9 A Hold on. You are not giving me -- hey, hey,
11:03:45 10 Ms. Henderson, you need to give me the amount of time
11:03:47 11 and the proper considerations to talk to my counsel. I
11:03:49 12 am asking him a question, and you are interrupting.
11:03:52 13 Please stop. Thank you.

11:03:54 14 THE WITNESS: Michael Hayden, so can I see the
11:03:56 15 person that she is in the room with?

11:04:01 16 MR. HAYDEN: You cannot. There's
11:04:02 17 court reporters and all kinds of people in the room, but
11:04:04 18 I would --

11:04:05 19 THE WITNESS: No, no, no. I am talking about
11:04:05 20 in Ms. Henderson's room. Isn't --

11:04:06 21 (Multiple Simultaneous Speakers.)

11:04:07 22 MS. HENDERSON: So -- I am going to interrupt
11:04:08 23 because this is my deposition, and you can ask your
11:04:09 24 counsel about these types of while you are --

11:04:13 25 (Multiple Simultaneous Speakers.)

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11:04:14 1 THE WITNESS: Interrupt -- why are you
11:04:15 2 screaming? Please, lower your voice.
11:04:17 3 MS. HENDERSON: You can ask --
11:04:17 4 (Multiple Simultaneous Speakers.)
11:04:20 5 THE WITNESS: You are making me feel
11:04:20 6 threatened.
11:04:20 7 MS. HENDERSON: You can ask -- okay.
11:04:20 8 THE WITNESS: You are making me feel
11:04:20 9 threatened.
11:04:20 10 MS. HENDERSON: Okay. So at this point, I am
11:04:21 11 going to suspend the deposition, because the witness is
11:04:25 12 clearly noncooperative --
11:04:26 13 (Multiple Simultaneous Speakers.)
11:04:27 14 THE WITNESS: I am cooperative.
11:04:27 15 (Multiple Simultaneous Speakers.)
11:04:27 16 MS. HENDERSON: -- let the record speak for
11:04:28 17 itself. We can let the record speak for itself. I will
11:04:33 18 be moving to compel --
11:04:33 19 (Multiple Simultaneous Speakers.)
11:04:36 20 THE WITNESS: Michael Hayden, you see this.
11:04:36 21 She's not giving me a chance to speak.
11:04:37 22 (Multiple Simultaneous Speakers.)
11:04:37 23 MS. HENDERSON: -- and this is not over.
11:04:39 24 THE WITNESS: She's not giving me any chance
11:04:40 25 to speak. This is crazy. This is ridiculous.

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11:04:41 1 MS. HENDERSON: Okay. So, Ronny --

11:04:43 2 (Multiple Simultaneous Speakers.)

11:04:44 3 THE WITNESS: She's not even --

11:04:46 4 MR. HAYDEN: Let her make the record, though.

11:04:47 5 Let her make the record. Let her make the record.

11:04:47 6 (Multiple Simultaneous Speakers.)

11:04:48 7 THE WITNESS: She's not giving me a chance to

11:04:49 8 legally clarify, with my counsel, questions, and she's

11:04:53 9 getting frustrated, and now she's intimidating me by

11:04:56 10 screaming and raising her voice.

11:04:58 11 MS. HENDERSON: Okay. So I'm going to put on

11:04:59 12 the record that at this point, I am suspending the

11:05:02 13 deposition because the witness is clearly evading my

11:05:06 14 questions and is nonresponsive, and we will be moving to

11:05:09 15 compel this deposition with the court.

11:05:12 16 So, Mr. Peterson, this is not over, and we

11:05:14 17 will see you another day, which I'm sure -- I know you

11:05:16 18 said that you have all the time in the world. So we

11:05:19 19 will see you again for Volume II of this deposition.

11:05:22 20 Thank you.

11:05:22 21 THE WITNESS: Change your hair next time.

11:05:26 22 THE VIDEOGRAPHER: If we are going to suspend

11:05:27 23 here, I just need to get transcript and video orders

11:05:29 24 for --

11:05:29 25 (Multiple Simultaneous Speakers.)

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11:05:34 1 THE WITNESS: Just comb it at least. Will you
11:05:34 2 comb it at least?
11:05:36 3 THE COURT REPORTER: We'll just do it after.
11:05:36 4 MS. HENDERSON: Yes. I will be ordering this
11:05:37 5 transcript and this video.
11:05:37 6 THE WITNESS: Thank you so much. Just comb
11:05:37 7 it. That's all I ask.
11:05:39 8 THE VIDEOGRAPHER: And, Ms. Henderson, would
11:05:40 9 you like it synched as well?
11:05:42 10 MS. HENDERSON: Yes.
11:05:43 11 THE WITNESS: A comb. A comb. Honeycomb.
11:05:47 12 THE VIDEOGRAPHER: And, Mr. -- Mr. Hayden,
11:05:48 13 copy for you?
11:05:49 14 MR. HAYDEN: No, thanks.
11:05:50 15 THE WITNESS: A comb. A comb.
11:05:54 16 THE VIDEOGRAPHER: Mr. Pancier?
11:05:57 17 MR. PANCIER: Negative.
11:05:57 18 (Multiple Simultaneous Speakers.)
11:05:57 19 THE WITNESS: A brush. Barbie brush.
11:05:59 20 (Multiple Simultaneous Speakers.)
11:05:59 21 THE VIDEOGRAPHER: If there's nothing else, I
11:05:59 22 can go ahead and read us off here.
11:05:59 23 MS. HENDERSON: Thank you.
11:06:00 24 THE WITNESS: A comb.
11:06:00 25 THE VIDEOGRAPHER: -- Volume I of the

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11:06:00 1 deposition of Daystar Peterson in the matter of
11:06:03 2 Megan Pete versus Milagro --
11:06:05 3 THE WITNESS: Bring a comb.
11:06:05 4 (Multiple Simultaneous Speakers.)
11:06:05 5 THE VIDEOGRAPHER: -- Cooper. Now off the
11:06:06 6 record. The time is 11:06 AM Pacific time.
11:06:09 7 (Multiple Simultaneous Speakers.)
11:06:09 8 THE WITNESS: Bring a comb.
11:06:09 9 MS. HENDERSON: Thank you.
11:06:09 10 THE WITNESS: Bring a comb.
11:06:09 11 (Proceedings concluded at 11:06 AM.)
11:06:09 12 - - -

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DECLARATION UNDER PENALTY OF PERJURY

I, the undersigned, declare under penalty of perjury that I have read the entire foregoing transcript of my deposition or the same has been read to me, and the same is true and accurate, save and except for changes, corrections, additions or deletions indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the ____ day of _____, 20____,
at _____, _____.
(City) (State)

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1 I, RONNY ZAVOSKY, CSR No. 12359, certify that
2 the foregoing proceedings were taken before me at the
3 time and place therein set forth, at which time the
4 witness was duly sworn and that the transcript is the
5 true record of the testimony so given;

6
7 Witness review, correction and signature;

8 () shall be per venue code () was requested

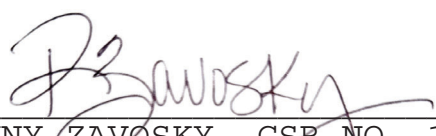
9 () was not requested () was waived

10 () not handled by the deposition officer due to
11 party stipulation

12
13 The dismantling, unsealing, or unbinding of
14 the original transcript will render the reporter's
15 certificate null and void.

16 I further certify that I am not financially
17 interested in the action, and I am not a relative or
18 employee of any attorney of the parties, nor of any of
19 the parties.

20 Dated this 14th day of April, 2025.

21
22
23 
24 RONNY ZAVOSKY, CSR NO. 12359
25 CERTIFIED SHORTHAND REPORTER